

RICHARD M. SQUIRE & ASSOCIATES, LLC

ATTORNEYS AT LAW

www.squirelaw.com

Richard M. Squire *
M. Troy Freedman
Michael J. Clark ^
* Also admitted in MD
^ Also admitted in NJ

One Jenkintown Station
115 West Avenue, Suite 104
Jenkintown, PA 19046
Tel.: (215) 886-8790 Fax: (215) 886-
8791

1415 Route 70 East
Suite 600
Cherry Hill, NJ 08034
(609) 246-2418

Please reply to:
[X] Jenkintown
[] Cherry Hill

May 25, 2021

VIA REGULAR MAIL AND TELECOPY TO: 215-545-0611

Brad J. Sadek
Sadek and Cooper
1315 Walnut Street
Suite 502
Philadelphia, PA 19107

VIA REGULAR MAIL AND CERTIFIED MAIL RETURN RECEIPT REQUESTED

David A Jerri
4000 Louise Avenue
Croydon, PA 19021

RE: NOTICE OF DEFAULT

Debtor(s): David A Jerri

Our Client: Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not
individually but as trustee for Pretium Mortgage Acquisition Trust

Property: 400 LOUISE AVENUE, CROYDON, PA 19021

Bankruptcy Case #: 20-11263-amc

Dear Sir/Madam:

As you may recall, this office represents Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust to the above-referenced bankruptcy proceeding.

It has been called to my attention that the Debtor has failed to make certain payments as due under the parties Stipulation, which was approved by the U.S. Bankruptcy Court on January 20, 2021. In particular, the Debtor has failed to make the April 1, 2021 to May 1, 2021 regular monthly mortgage payments of \$1,670.05 each. A suspense amount of (\$1,645.90). A Notice of Default fee in the amount of \$75.00. All of these amounts total \$1,769.20. Also, the Debtor has failed to file an amended plan as agreed.

It is hereby requested that the Debtor immediately forward the sum of \$1,769.20 to our client.

If the Debtor fail(s) to cure the aforesaid default within ten (10) days from the date of this letter,

we will have no alternative but to certify default to the Court and request the entry of an Order granting relief from the automatic stay.

Thank you for your attention to this matter.

Very truly yours,

Richard M. Squire, Esq.
M. Troy Freedman, Esq.
Michael J. Clark, Esq.
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, PA 19046
215-886-8790
215-886-8791 (FAX)
rsquire@squirelaw.com
tfreedman@squirelaw.com
mclark@squirelaw.com